



AMERICAN ACADEMY
OF OPHTHALMOLOGY

OPHTHPAC

Political Committee

RECEIVED
FEDERAL ELECTION
COMMISSION MAIL ROOM

APR 20 3 27 PM '98



April 9, 1998

Mr. Kenneth A. Davis Jr.
Reports Analyst
Reports Analysis Division
Federal Election Commission
999 E Street, NW
Washington, D.C. 20463

Identification Number: C00196246

Reference: June Monthly Report (6/1/97-6/30/97)

Dear Mr. Davis,

Our office received a letter from you on March 25, 1998. In it you state that the American Academy of Ophthalmology's Political Action Committee appears to have exceeded the \$5,000 per election limit for making a contribution to a candidate for federal office. In support of this, you enclosed two of our PAC's Schedule B reports, one for the period of 12/01/95 - 12/31/95 and the other for the period of 06/01/97 - 06/30/97. The contribution highlighted in each of these reports was made to the Wyden for Senate committee.

The \$5,000 contribution made in December of 1995 was for the 1996 Senate Primary election. The \$2,000 contribution made in June of 1997 was for the 1998 Senate Primary election. In our Schedule B report, it appears that the contribution in December 1995 was made after the election date that year and the FEC has chosen to apply the contribution amount to the following election (Senate Primary 1998).

In actuality, the December 1995 \$5,000 contribution was for Debt Retirement for the 1996 Senate Primary election. This was not properly indicated at the time of that month's FEC filing. We hope this explains our Schedule B report and apologize for any inconvenience this may have caused.

If you have any further questions please do not hesitate to contact me.

Sincerely,

Paula E. Lent

Paula E. Lent
Treasurer

Encl.

655 BEACH STREET
P.O. Box 7424
SAN FRANCISCO
CALIFORNIA 94120-7424

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

MAR 25 1998

Paula E. Lent, Treasurer
American Academy of Ophthalmology Inc.
Political Committee
655 Beach Street
San Francisco, CA 94109

Identification Number: C00196246

Reference: July Monthly Report (6/1/97-6/30/97)

Dear Ms. Lent:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Schedule B of your report (pertinent portion(s) attached) discloses a contribution(s) which appears to exceed the limits set forth in the Act. 2 U.S.C. §441a(a) precludes a multicandidate committee and its affiliates from making a contribution to a candidate for federal office in excess of \$5,000 per election.

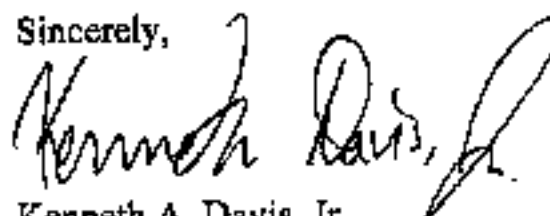
If the contribution(s) in question was incompletely or incorrectly disclosed, you should amend your original report with clarifying information. If you have made an excessive contribution, you should notify the recipient and request a refund of the amount in excess of \$5,000 and/or notify the recipient in writing of your redesignation of the contribution. In the best interest of your committee, all refunds and redesignations should be made within sixty days of the treasurer's receipt of the contribution(s).

Please inform the Commission of your corrective action immediately in writing and provide a photocopy of the refund request sent to the recipient committee(s). In addition, any refunds should be disclosed on Schedule A supporting Line 16 of the report covering the period during which they are received. Any redesignations should be disclosed as memo entries on Schedule B supporting Line 23 of the report covering the period during which the redesignation is made. 11 CFR §110.1(b)

Although the Commission may take further legal action regarding the excessive contribution(s), your prompt action in obtaining a refund and/or redesignating the contribution(s) will be taken into consideration.

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 694-1130.

Sincerely,

A handwritten signature in dark ink, appearing to read "Kenneth Davis, Jr.", with a stylized flourish at the end.

Kenneth A. Davis, Jr.

Reports Analyst

Reports Analysis Division

01/25/96

American Academy of Ophthalmology Inc Political Committee (OPWTFAC)
 Itemized Disbursements
 Contributions to Federal Candidates and Other Political Committees
 Schedule 3
 From 12/01/95 To 12/31/95

Page: 2 of 9
 Line Number 23

Any information copied from such Reports or Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

| NAME and ADDRESS | DISBURSEMENT PURPOSE | DATE | AMOUNT |
|--|---------------------------|----------|----------|
| Friends of Senator Rockefeller 245 Second Street NE Suite 308 Washington DC 20002 | SENATE / / 96 / | 12/20/95 | 3,000.00 |
| Bonior for Congress 237 South Gratiot Mt Clemens MI 48043 | HOUSE / 10 / 96 / Primary | 12/20/95 | 1,000.00 |
| People for Ganske 9907 Grand Avenue Des Moines IA 50312 | HOUSE / 4 / 96 / Primary | 12/20/95 | 4,000.00 |
| Gyden for Senate Post Office Box 3498 Portland OR 97208 | SENATE / / 96 / Primary | 12/20/95 | 3,000.00 |
| Bill Hefner for Congress Conn PO Box 3016 Concord NC 28026 | HOUSE / 8 / 96 / Primary | 12/20/95 | 1,000.00 |
| Weldon for Congress Committee 1805 South Babcock Street Melbourne FL 32901 | HOUSE / 15 / 96 / Primary | 12/20/95 | 1,000.00 |
| Hinge for Congress 2630 South 1st Street Willmar MN 56201 | HOUSE / 2 / 96 / Primary | 12/20/95 | 1,000.00 |

Subtotal: 16,000.00

7/18/97 American Academy of Ophthalmology Inc Political Committee (OAP/OTIPAC)
 Itemized Disbursements
 Contributions to Federal Candidates and Other Political Committees
 Schedule B
 From 06/01/97 to 06/30/97

Page: 7 of 23
 Line Number 23

Information copied from such Reports or Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address any political committee to solicit contributions from such committee.

| NAME AND ADDRESS | DISBURSEMENT PURPOSE | DATE | AMOUNT |
|--|---------------------------------|----------|----------|
| Illone for Congress Box 3176 | | 06/20/97 | 1,000.00 |
| ing Branch NJ 07740 | HOUSE / 6 / NJ 98 / Primary | | |
| iden for Senate 6 Maryland Ave NE 105 Washington DC 20002 | SENATE / / OR 98 / Primary | 06/20/97 | 2,000.00 |
| alter Camps for Congress Box 91429 | | 06/26/97 | 500.00 |
| into Barbara CA 95190 | HOUSE / 22 / CA 98 / Primary | | |
| dbb for Senate 329 West Oak Place | | 06/26/97 | 1,000.00 |
| enna VA 22182 | SENATE / / VA 2000 / Primary | | |
| Ken Tierney for Congress Main Street | | 06/26/97 | 500.00 |
| eebody MA 01960 | HOUSE / 6 / MA 98 / Primary | | |
| cotty Bassler for Congress 365 Harrodsburg Road | | 06/25/97 | 1,000.00 |
| Washington KY 40504 | HOUSE / 6 / KY 98 / Primary | | |


Subtotal: 6,000.00

TOTAL: 51,000.00

Federal Election Commission

**ENVELOPE REPLACEMENT PAGE
FOR INCOMING DOCUMENTS**

The Commission has added this page to the end of this filing to indicate how it was received.

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|---|--------------------------------------|
| <input type="checkbox"/> Hand Delivered | Date of Receipt |
| <input checked="" type="checkbox"/> First Class Mail | POSTMARKED 4-13-98 |
| <input type="checkbox"/> Registered/Certified Mail | POSTMARKED |
| <input type="checkbox"/> No Postmark | |
| <input type="checkbox"/> Postmark Illegible | |
| <input type="checkbox"/> Received from the House office of Records and Registration | Date of Receipt |
| <input type="checkbox"/> Received from the Senate Office of Public Records | Date of Receipt |
| <input type="checkbox"/> Other (Specify): | Postmarked and/or Date of Receipt |
| <input type="checkbox"/> Electronic Filing | |
|  PREPARER | 4-22-98 DATE PREPARED |